

**Millennium**  
Millennium Holdings, LLC

EPA Region 5 Records Ctr.



312140

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Houston, TX 77010

Phone: 713-309-3947  
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October 29, 2008

Mr. Michael Berkoff  
Remediation Project Manager  
U.S. EPA Region 5  
Superfund Division  
Remedial Response Section #2  
SR-6J  
77 W Jackson Blvd.  
Chicago, Illinois 60604

**Subject:**

Work Plan Preparation to Address City Concerns Regarding Uncertainty in Existence or Completeness of Groundwater Pathway to City Well Field  
Allied Paper, Inc./ Kalamazoo River/ Portage Creek Superfund Site  
Allied Paper Operable Unit (OU)

Dear Mr. Berkoff:

Millennium Holdings LLC (Millennium) has been requested by the U.S. Environmental Protection Agency (USEPA) to provide additional information to address concerns expressed by the City of Kalamazoo regarding uncertainty in the existence or completeness of a pathway for polychlorinated biphenyls (PCB) in groundwater from the Allied Paper Operable Unit (OU) to the City's wellfield. Representatives of Millennium met with the City on October 27<sup>th</sup> to discuss those concerns. Millennium believes that the existing information in the March 2008 Remedial Investigation Report for the Allied OU provides a basis, when all of the available lines of evidence are reviewed, to conclude that a pathway does not exist for PCB in materials situated at the Site to be transported to the City's wellfield; however, the City has expressed a desire for additional information to be able to more fully consider and develop a level of confidence that the City's wellfield would not be impacted by the Site.

Millennium will provide a draft Work Plan for review and discussion with USEPA that will incorporate an evaluation of existing information (for example from existing off-site wells or previous off-site investigation) and will recommend additional activity, if necessary, to reduce uncertainty. This draft Work Plan will be based on the review of available data, prior discussions with USEPA and the City of Kalamazoo, and the April 30, 2008 Michigan Department of Environmental Quality (MDEQ) interoffice communication from Brant Fisher to Paul Bucholtz. The draft Work Plan will describe the data to be collected, locations from which data will be collected, and the procedures to be used when collecting the data. Information generated from implementation of this draft Work Plan will be used with existing information to reduce uncertainty in the determination of presence/ absence of a groundwater pathway to the City's wellfield. The draft Work Plan will be provided to USEPA on or by December 7, 2008.

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Please contact me if you have any questions or comments regarding this submittal.  
Sincerely,

Millennium Holdings, LLC



Suda Anandare

By: [Signature] - Biddle & Reath LLP  
any [Signature] ARCADIS  
Mike Erickson, ARCADIS